UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE

DEC 3 0 2008

Richard L. Marcantonio, CEO
G&K Services, Inc.
5995 Opus Parkway
Minnetonka, MN 55343

Re: Clean Air Act Testing Order and Reporting Requirement, Docket No. AAA-09-0004

Dear Mr. Marcantonio:

The United States Environmental Protection Agency ("EPA") is evaluating whether G&K Services, Inc. in Manchester and Portsmouth, New Hampshire ("G&K"), is in compliance with the Clean Air Act (the "Act") and state and federal regulations promulgated under the Act. These requirements include but are not limited to a State of New Hampshire Permit to Operate issued on March 2, 2007 and amended May 9, 2007 for the Manchester, New Hampshire facility and the federally enforceable sections of the New Hampshire State Implementation Plan regulations at Env-A 600.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act.

Reporting Requirement

Within 30 days of receiving this letter, G&K is required to provide the following information:

1. Provide the following information about G&K and the facilities located at 324 Taylor Street in Manchester, New Hampshire ("the Manchester facility"), and 124 Bartlett Street in Portsmouth, New Hampshire (the "Portsmouth facility"):
    a. Describe the ownership and business structure;
    b. Indicate the date and state of incorporation;
    c. List any partners or corporate officers;
    d. List any parent and subsidiary corporations;
    e. Provide the number of employees at each facility;

f. Provide the net worth of the company;
g. Provide the date that G&K began operating at each location.

2. Provide the following information on the washers and dryers that are used for laundering towels at both facilities including:
   a. Location of each washer and dryer (either Manchester or Portsmouth);
   b. Make, model, capacity and any other operational specifications of each washer and dryer;
   c. Date of purchase of each washer and dryer;
   d. Date of installation of each washer and dryer;
   e. Date that each washer or dryer was put into operation.

3. Provide any calculations or data, including any emission factors that quantify the volatile organic compound ("VOC") and/or hazardous air pollutant ("HAP") emissions from towel laundering operations at the Portsmouth and/or Manchester facilities.

4. Provide copies of all records G&K used to track the monthly volatile organic compound (VOC) emissions at each facility between January 1, 2003, and December 31, 2008. The records should include the total amount of raw materials that contain VOCs, including cleaning agents, solvents, soiled towels, and fuels used at the facility. Specifically:

   a. For all cleaning agents used at each facility provide copies of:
      i. All logs or receipts of shipments of cleaning agents;
      ii. The Material Safety Data Sheet (MSDS) for each cleaning agent received (note: if the MSDS does not state VOC content, provide the manufacturer's specification of VOC content of the product);
      iii. Records of the amount of cleaning agents used each month; and
      iv. A calculation of monthly VOC emissions from cleaning agents (explain any assumptions).

   b. For all solvents used at each facility provide copies of:
      i. All logs or receipts of shipments of solvents;
      ii. The MSDS for each solvent received (note: if the MSDS does not state VOC content, provide the manufacturer's specification of VOC content of the product);
      iii. Records of the amount of solvent used each month; and
      iv. A calculation of monthly VOC emissions from solvents (explain any assumptions).

   c. For all soiled towels provide:
      i. The pounds of soiled towels received and processed at each facility each month in the following categories:
         1. Blue Towels (print towels);
         2. Orange Towels (machine towels);
         3. Green Towels (mechanic towels);
         4. White Towels (restaurant towels);

ii. Any data describing the VOC content of any of the soiled towels;
iii. Any data or calculations of a dirty to clean ratio (e.g. 200 pounds of soiled print towels will result in 100 pounds of clean print towels);
iv. Records of VOC content at any point in the wastewater stream;
v. A calculation of monthly VOC emissions from wastewater pretreatment operations (explain any assumptions); and
vi. A calculation of monthly VOC emissions from towel laundering operations at each facility (explain any assumptions).

d. For all fuels at each facility provide copies of:
   i. All logs or receipts of shipments of fuel;
   ii. The MSDS for each fuel received (note: if the MSDS does not state VOC content of the fuel, provide the fuel distributor's specification of VOC content);
   iii. Records of the amount of fuels used each month; and
   iv. A calculation of monthly VOC emissions from fuels (explain any assumptions).

5. Provide copies of the calculations and the data that G&K used to fill out the New Hampshire Department of Environmental Services "Annual Emissions Report" for 2003 through 2008.

6. For each year from 2003 through 2008, provide an estimate of the average length of time in days that soiled towels were stored on-site or in trucks at the Portsmouth or Manchester locations and at affiliated depot locations. Include copies of supporting information.

7. Provide a list of all other process equipment (e.g. extractors, aeration dryers) and process support equipment (e.g. boilers, compressors) valued above $10,000 that G&K purchased since January 1989. Also, for each piece of equipment, provide the following information (and corresponding documentation):
   a. The location of the equipment (Manchester or Portsmouth);
   b. The purpose/role of the equipment;
   c. The date the equipment was purchased;
   d. The date the equipment installation was completed;
   e. The date the equipment began operating; and
   f. The name of the manufacturer, model number, size, maximum production rate, and any other operational specifications.

8. Provide copies of all correspondence G&K (or any of its predecessors) has had with state and federal environmental agencies regarding emissions of air pollution, including copies of:
   a. All permits issued;
   b. All permit applications; and
   c. Any requests for permit modifications.

Testing Order

This Testing Order ("TO") requires G&K to sample and test emissions of VOCs and HAPs from the Manchester facility's towel plant.

Within the number of days specified in each paragraph below, G&K is required to provide all the information and take the steps outlined below.

1. Within seven days of receipt of this TO, contact EPA's Bill Osbahr, at 617-918-8389, to schedule a pre-test conference. At the pre-test conference, EPA will review with G&K the various sampling, monitoring, testing, and analysis locations, procedures, and methods to be followed on the date(s) of the tests.

2. Within 30 days of receipt of this TO, prepare and mail to EPA a pre-test protocol for testing VOC and HAP emissions from the towel plant – using the applicable methods in 40 C.F.R. Part 60, Appendix A.

3. Within 60 days of receipt date of this TO, attend a pre-test conference with EPA, and schedule the testing date(s).

4. Within 90 days of receipt of this TO, conduct testing to measure VOC and HAP emissions from the towel plant. Note that G&K may have to create a temporary (or permanent) total enclosure around the towel plant wash room prior to conducting testing. Testing is to be conducted under a worst-case scenario with heavily soiled shop and print towels.

5. Within 30 days of completing each test, submit a complete test report to EPA.

Attachment A to this TO provides lists of required elements for pre-test protocols and test reports. Mail the submissions required by this letter to:

Susan Studlien, Director
Office of Environmental Stewardship (Mail Code SEA)
U.S. Environmental Protection Agency, Region I
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023
Attn: Elizabeth Kudarauskas, Air Technical Unit

and to:

Pamela Monroe, Compliance Bureau Administrator
New Hampshire Department of Environmental Services
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

Be aware that if G&K does not provide the requested information, EPA may order G&K to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law also establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

G&K may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Note that certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to G&K.

If you have any questions regarding this reporting requirement, please contact Elizabeth Kudarauskas at (617) 918-1564 or have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,

Sam Silverman, acting for

Susan Studlien, Director
Office of Environmental Stewardship

cc: Michael Peterson, G&K Manchester, NH
Bill Osbahr, EPA OEME
Pamela Monroe, NH DES

Enclosure

Attachment A to Testing Order

REQUIREMENTS FOR EMISSION TESTING

A. PRETEST INFORMATION REQUIREMENTS

In order to establish uniform requirements and help ensure that proper test methods and procedures are utilized, the information specified below must be submitted to EPA Region I - New England at least 30 days prior to the scheduled test date. In the event of any deficiencies or discrepancies in the test protocol, the company will be notified. Submission of this information will minimize the possibility of a test rejection resulting from improper sampling or data collection procedures.

Except as otherwise provided by EPA, testing shall be performed in strict accordance with procedures specified in the Code of Federal Regulations ("C.F.R."), Title 40, Part 60, Appendix A, Standards of Performance for New Stationary Sources, as amended, or in Title 40, Part 61, Appendix B, National Emission Standards for Hazardous Air Pollutants, as amended. Any variations in the sampling or analytical procedures must be indicated in the pretest information and receive written approval from EPA prior to testing.

The information to be submitted must include at a minimum:

1. Identification and a brief description of the source to be tested. The description should include:

    a. Type of industrial process or combustion facility;

    b. Type and quantity of raw and finished materials used in the process;

    c. Description of any cyclical or batch operations which would tend to produce variable emissions with time;

    d. Basic operating parameters used to regulate the process; and

    e. Rated capacity of the process.

2. A brief description of the air pollution control equipment associated with the process, including:

    a. Type of control device;

    b. Operating parameters;

c. Rated capacity and efficiency; and

d. Ultimate disposal of wastes.

3. Type of pollutant to be sampled (particulate matter, NOx, SO2, hydrocarbons, etc.).

4. A description of the emission sampling equipment, including a schematic diagram of the sampling train.

5. A description of the sampling and analysis procedures (reference standard methods, if applicable). Indicate any proposed variations with justification.

6. A sketch with dimensions indicating the flow of exhaust gases from the process, through the control equipment and associated ductwork to the stack.

7. In accordance with 40 C.F.R. Part 60, Method 1:

   a. An elevation view of the dimensions of the stack configuration indicating the location of the sampling ports and distances to the nearest upstream and downstream flow interferences; and

   b. A cross-sectional sketch of the stack at the sampling location with dimensions indicating the location of the sampling traverse points.

8. Estimated flue gas conditions at sampling location, including temperature, moisture content, and velocity pressure.

9. A description of the process and control equipment operating data to be collected during the sampling period.

10. Copies of the field data sheet forms to be used during the tests.

11. Names and titles of personnel who will be performing the tests.

12. A description of the procedures for maintaining the integrity of the samples collected, including chain of custody and quality control procedures.

13. Calibration sheets for the dry gas meter, orifice meter, pilot tube, and/or any other equipment that requires calibration.

14. A list of pre-weighed filters to be used during particulate emission testing, including identification and tare weights.

(Note: Items No. 13 and 14 must be submitted prior to actual testing, but do not have to be included with the pretest information.)

B. EMISSION TEST REPORT REQUIREMENTS

The emission test report must contain all pertinent data concerning the tests, including a description of the process and operating conditions under which the tests were made, the results of the tests, and test procedures. While the exact format of the report will vary depending upon the type and objective of the tests, below is a suggested format containing elements that must be incorporated in the report.

1. Introduction

    a. Identification, location, and dates of tests;

    b. Purpose of tests;

    c. Brief description of source; and

    d. Name and affiliation of person in charge of tests.

2. Summary of results

    a. Operating and emission data; and

    b. Comparison with applicable emission regulations.

3. Source description

    a. Description of process including operation of emission control equipment;

    b. Flow sheet (if applicable);

    c. Type and quantity of raw and finished materials processed during the tests;

    d. Maximum normal rated capacity of the process; and

    e. Description of process instrumentation monitored during the test.

4. Sampling and analytical procedures

    a. Description of sampling train and field procedures;

    b. Description of recovery and analytical procedures;

    c. Sketch indicating sampling port locations relative to process, control equipment upstream and downstream flow disturbances; and

d. Sketch or cross-sectional view of stack indicating traverse point locations.

5. Test results and discussion

   a. Detailed tabulation of results including process operating conditions, flue gases conditions;

   b. Discussion of significance of results relative to operating parameters and emission regulations; and

   c. Discussion of any divergences from normal sampling procedures or operating conditions which could have affected the test results.

6. Calculation and data reduction methods

   a. Description of computational methods, including equation format used to obtain final emissions results from field data; and

   b. Sample calculations from at least one run of each type of test performed.

7. Appendix

   a. Copies of all field data collected during the test, including sampling data sheets and process operating logs;

   b. Copies of all analytical laboratory data;

   c. Calculation sheets or computer input and output data;

   d. Sampling equipment and laboratory calibration data;

   e. Names and titles of personnel and organizations participating in the tests;

   f. Visible emission observations performed during the tests (if required); and

   g. Copies of all chain of custody information.